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February 14, 2025

## VIA ECF

The Honorable Barbara C. Moses  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 20A  
New York, New York 10007

Application GRANTED. The parties must submit a status update regarding the outcome of mediation no later than **April 4, 2025**. SO ORDERED.

2/14/2025

Barbara Moses, U.S.M.J.

Re: Hall v. City of New York, No. 1:22-cv-10193-GHW-BCM

Dear Judge Moses:

We represent Named Plaintiff Dawn Hall and the 34 individuals who joined this action (together, "Plaintiffs") in the above-referenced matter. We write jointly with Defendant City of New York ("Defendant" or the "City") to respectfully request an adjournment of the parties' February 19, 2025 mediation to March 28, 2025. ECF No. 96.

By way of background, the parties requested an adjournment of their January 16, 2025 mediation to February 19, 2025 to allow time for Defendant to determine whether damages for certain Plaintiffs who performed work while out of title at the Department of Housing Preservation & Development could be included in the parties' negotiations at mediation. *See* ECF No. 95 at 1. Since then, the parties have resolved this issue. However, Defendant still needs to obtain additional authorization to resolve all claims that have accrued in the last 12 months. Defendant requested that Plaintiffs provide certain records to assist Defendant in obtaining final authorization for a comprehensive settlement of all claims. Plaintiffs are working diligently to obtain and produce the requested records and the parties plan to meet and confer numerous times in the coming weeks to resolve certain disputes before mediation.

To that end, the parties respectfully request an adjournment of the February 19, 2025 mediation to March 28, 2025 (the next date the parties and mediator, Kim Berg, Esq. are available) to provide the parties adequate time to negotiate and attempt to resolve this case. Of course, the parties are aware that they have now postponed mediation multiple times; however, they continue to narrow the issues that require resolution and continue to work amicably towards a final comprehensive settlement of all claims in this matter, without requiring judicial intervention.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Camilo M. Burr

Cc: Counsel of Record (via ECF)